

UNITED STATES OF AMERICA  
Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Experimental Presorted )  
Priority Mail Rate Categories, 2001 )

Docket No. MC2001-1

OFFICE OF THE CONSUMER ADVOCATE  
INTERROGATORIES TO UNITED STATES POSTAL SERVICE  
WITNESS: ROBERT F. KALENKA (OCA/USPS-T3-3-5)  
(April 24, 2001)

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Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate ("OCA") hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-6 to witness Thomas M. Scherer dated March 23, 2001, are hereby incorporated by reference.

Respectfully submitted,



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Office of the Consumer Advocate

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OCA/USPS-T3-3. Please refer to your response to OCA/USPS-T3-1(a). Does ADP possess software other than Group One that has the capability to arrange mailing lists in presort order for pieces mailed at Priority Mail rates? If so, please identify that software and explain.

OCA/USPS-T3-4. Please refer to your testimony at page 7, lines 9-11, where it states, "Finally, on those occasions in the past when ADP has presorted its Priority Mail prior to presenting it to the Postal Service, ADP has noticed an improvement in the speed with which our mailings reach our customers."

- a. On how many occasions in the past has ADP presorted its Priority Mail prior to presenting it to the Postal Service?
- b. When was the most recent occasion that ADP presorted its Priority Mail prior to presenting it to the Postal Service?
- c. On those occasions in the past when ADP has presorted its Priority Mail prior to presenting it to the Postal Service, did ADP utilize Group One or some other software to presort its Priority Mail? Please explain.
- d. On those occasions in the past when ADP has presorted its Priority Mail prior to presenting it to the Postal Service, what depth of sort did ADP typically achieve? Please explain.
- e. What prompted ADP on those occasions in the past to presort its Priority Mail prior to presenting it to the Postal Service? Please explain.
- f. On those occasions in the past when ADP has presorted its Priority Mail prior to presenting it to the Postal Service, did ADP know in advance of presorting that it

would obtain an improvement in the speed with which the mailings reached customers? Please explain.

OCA/USPS-T3-5. Please refer to the Attachment to this interrogatory, which is a copy of an envelope from Firststar Trust Services.

- a. Are you familiar with Firststar Trust Services and the services provided by this company? Please explain.
- b. Do you consider Firststar Trust Services to be a competitor of ADP? Please explain.
- c. The contents and envelope from Firststar Trust Services weighed 12.2 ounces. In your experience, how typical is this weight for proxy material, prospectuses, and annual reports? Please explain.



PO BOX 2077  
MILWAUKEE WI 53201 2077

ADDRESS SERVICE REQUESTED



PSRT  
FIRST-CLASS  
US POSTAGE  
PAID  
CINCINNATI OHIO  
PERMIT NO 8093

Attachment to OCA/USPS-T3-5

**PROXY MATERIAL ENCLOSED**

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

  
Stephanie Wallace

Washington, D.C. 20268-0001  
April 24, 2001